

LOWTHER | WALKER LLC

April 29, 2019

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 5/1/2019

MEMO ENDORSED

VIA CM/ECF ONLY

Re: *United States of America v. Elizabeth Ann Pierce*, No. 1:18-CR-00388-ER-1
(S.D.N.Y. Aug. 20, 2018)

Motion to Adjourn Sentencing

Judge Ramos:

This Court has scheduled the sentencing hearing in this case for Thursday, May 16, 2019, at 11:00 a.m. (Min. Order, Feb. 11, 2019.)

I respectfully move this Court to adjourn the sentencing hearing until the week of June 16, 2019, which is the first time period after the initial sentencing date during which the attorneys for the parties have no scheduled conflict. The purpose of the adjournment is to allow me a sufficient time in which to develop Ms. Pierce's arguments in support of her objections to the Presentence Investigation Report and in mitigation, and to present those arguments to this Court in a sentencing memorandum. The alleged amount of loss in this case exceeds \$250,000,000.00, and the evidence is complex and voluminous; therefore, I respectfully submit that this short adjournment is warranted, and it will not constitute an "unnecessary delay" pursuant to Fed. R. Crim. P. 32(b)(1).

Ms. Pierce has not requested any previous adjournments or extensions in this case, and the Government, by and through Assistant United States Attorney Sarah Lai, does not oppose this motion.

Respectfully submitted,

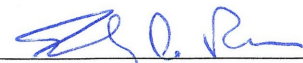
s/ Joshua Sabert Lowther, Esq.

Joshua Sabert Lowther, Esq.

cc: Assistant United States Attorney Sarah Lai
Assistant United States Attorney Vladislav Vainberg

Sentencing is adjourned to June 19, 2019,
at 10:00 a.m.

SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: 5/1/2019

New York, New York